

Statement of Ethics

Boulting Ltd is a multi-disciplined engineering solutions provider, operating in a diverse range of industry sectors in the UK and internationally.

We provide a wide scope of project services from project management, design, fabrication and installation to commissioning and ongoing maintenance services and we have strong in-house resources in all the major Engineering Construction disciplines, including: Mechanical, Electrical and Instrumentation, Technology, and HVAC/Sophisticated Environments.

We pride ourselves on our reputation for acting fairly and ethically wherever we do business. Our reputation is built on our values as a company, the values of our employees and our collective commitment to acting with integrity, honesty, openness and professionalism throughout our organisation.

Boulting Ltd condemns corruption in all its forms and we will not tolerate it in our business or in those we do business with.

Our Anti-Bribery and Corruption Policy sets out in detail how you should behave and what you should do if you are confronted with corruption. We expect that all of you will embrace the Policy and its values and use them in all aspects of your day-to-day work.

The Policy is for your benefit as much as for our customers, business partners, subcontractors, suppliers, and associated persons, and all others acting on behalf of Boulting Ltd.

If convicted of a bribery offence, Boulting Ltd might get a significant fine and suffer lasting reputational damage.

If you are convicted of a bribery offence, you could face up to ten years in prison.

The potential harm done by bribery, both to Boulting Ltd and to you, is long term and hugely outweighs any potential short term gain. Bribery is just not worth the risk.

If you have any doubts about anything at all, refer to the Policy or you can speak to the Compliance Officer in complete confidence. The Board are committed to eradicating corruption and we will stand by you in acting ethically.

Adopt the following principles: -

- **Responsibility**

You are responsible for your actions. If you break the law, you will have to face the consequences - which could mean a fine, imprisonment, or both.

- **Integrity**

Don't compromise your integrity. If you think something is wrong, ALWAYS report it. If you aren't sure, consult the Policy. Don't ever let yourself be forced into doing something you know or suspect is wrong.

- **Genuineness**

Always pay genuine prices for genuine goods and services. Never pay over the odds. Agents who ask for especially large fees or commissions may do so in order to pay bribes on your behalf. If this happens, you will be responsible. Excessive payments are obvious and will always be uncovered.

- **Honesty**

Act honestly and in good faith at all times and in all aspects of your work.

- **Transparency**

Keep accurate records (including all invoices and receipts) of everything that you do, especially in relation to the payments you make and what they are for. Full and accurate records demonstrate complete transparency and that you have nothing to hide.

Remember, take the RIGHT approach, and we can eradicate corruption together.

A handwritten signature in black ink, appearing to read 'M. Whyburn', with a long horizontal line extending to the right.

**On Behalf the Board of Directors
For and on behalf of Boulting Ltd**

February 2018